

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHRISTOPHER SPEAKES, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

TARO PHARMACEUTICAL INDUSTRIES, LTD.,
MICHAEL KALB, AND KALYANASUNDARAM
SUBRAMANIAN,

Defendants.

Case No.: 16-cv-08318-ALC-OTW

Hon. Andrew L. Carter Jr., U.S.D.J.

Hon. Ona T. Wang, U.S.M.J.

**NOTICE OF LEAD PLAINTIFF'S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT
AND AUTHORIZATION TO PROVIDE NOTICE TO THE CLASS**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiff City of Atlanta Firefighters' Pension Fund ("Lead Plaintiff" or "Atlanta Firefighters") hereby moves before Hon. Andrew L. Carter Jr., Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an Order, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure that, among other things: (i) preliminarily approves the Settlement of this class action; (ii) approves the form and manner of notice of the proposed Settlement to the members of the Class; (iii) appoints JND Legal Administration as Claims Administrator; (iv) schedules a hearing to consider final approval of the Settlement and Lead Counsel's motion for attorneys' fees and expenses; and (v) grants such other and further relief as the Court deems just and proper.¹

Defendants do not oppose the relief requested by this motion.

¹ All capitalized terms used herein that are not otherwise defined herein have the meanings ascribed to them in the Stipulation of Settlement dated April 10, 2024.

The motion is based on the accompanying Memorandum of Law in Support of Lead Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement and Authorization to Provide Notice to the Class, and the Declaration of Michael S. Bigin, dated April 15, 2024, with annexed exhibits, filed herewith.

A proposed Order Granting Preliminary Approval of Class Action Settlement, which was negotiated by the Parties to the Settlement is also submitted herewith.

Dated: April 15, 2024

Respectfully submitted,

/s/ Michael S. Bigin

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*Lead Counsel for Lead Plaintiff and the
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